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March 23, 2021

VIA ECF

Honorable Andrew L. Carter, Jr.
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: **United States of America v. Gazmend Lita**
Criminal Case No. 20-660(ALC)

Dear Judge Carter:

As part of the conditions of pretrial release in the above-captioned case, Mr. Gazmend Lita's travel was limited to the Southern and Eastern Districts of New York and the District of New Jersey. Mr. Lita's conditions of release permit temporary additional travel upon the consent of the Government and Pretrial Services. We write the Court to request a temporary modification of Mr. Lita's bail conditions to permit him to travel to Albania from April 10, 2021 through April 30, 2021.

Mr. Lita's mother currently lives in Albania. She is 78 years old and suffers from diabetes and high blood pressure. She was recently diagnosed with Covid-19 and although she seems to have recovered from the virus, it left her in a severely weakened state. According to the family's physician in Albania, she may not have long to live. Mr. Lita hopes to visit his mother for what he believes may be the last time. He hopes to travel from the United States to Albania on April 10, 2021 and return to the United States on April 30, 2021. Mr. Lita requests that he be permitted to travel during that time period and further requests that he be permitted to obtain his passport from Pretrial Services on or after April 7, 2021 in advance of his proposed travel. In accordance with the conditions of his release, Mr. Lita will provide Pretrial Services with any travel-related information it requests.

I have communicated with the Government (AUSAs Samuel Raymond and David Felton) and Pretrial Services (Officer Francesca Tessier-Miller). The Government has consented to my request and Pretrial Services has declined to take a position. Thank you for your consideration.

Honorable Andrew L. Carter, Jr., U.S.D.J.
United States District Court
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Respectfully submitted,

WHIPPLE AZZARELLO, LLC

By



John. A. Azzarello

JAA:wm

cc: David Fenton, A.U.S.A. (Via Email)
Samuel Raymond, A.U.S.A. (Via Email)
Francesca Tessier-Miller, U.S. Pretrial Services Officer (Via Email)

SO ORDERED

HONORABLE ANDREW L. CARTER
United States District Judge